

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re

FIELDWOOD ENERGY LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 20-33948 (MI)

(Jointly Administered)

**CERTIFICATE OF COUNSEL TO PLAN ADMINISTRATOR'S FIRST OMNIBUS
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF
THE BANKRUPTCY CODE AND RULE 3007 OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE SEEKING TO DISALLOW CERTAIN CLAIMS**

(Related Docket Nos. 2076)

The undersigned hereby certifies as follows:

1. On October 6, 2021, the *Plan Administrator's First Omnibus Objection To Claims Pursuant To Section 502(B) Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure Seeking To Disallow Certain Claims* [Docket No. 2076] (the "First Omnibus Objection") was filed with the Court by the administrator of the chapter 11 plan (the "Plan Administrator") of the above-captioned reorganized debtors. The deadline for parties to file a response to the First Omnibus Objection, unless extended by separate agreement filed on the Court's Docket, was November 5, 2021 (the "Objection Deadline").

2. After the filing of the First Omnibus Objection, PSZJ received informal comments to the proposed order approving the First Omnibus Objection, which informal comments were addressed and resolved by agreement.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

3. Additionally, on November 22, 2021, the Court entered the *Stipulation and Agreed Order Extending Response Deadline to Claim Objection and Adjourning Hearing Date* [Docket No. 2255] (the “Stipulation”), adjourning the hearing and response deadline with respect to one claim subject to the First Omnibus Objection.

4. Attached hereto as Exhibit 1 is an amended proposed form of order (the “Revised Proposed Order”), which indicates that the hearing on First Omnibus Objection has been adjourned solely with respect to the claim subject to the Stipulation. In addition, the Revised Proposed Order resolves all other known informal comments received by the Plan Administrator regarding the First Omnibus Objection and no formal responses were filed on the Court’s Docket prior to the Objection Deadline.

5. Accordingly, the Plan Administrator respectfully requests entry of the Revised Proposed Order attached hereto as Exhibit 1. A redline reflecting changes from the proposed form of order filed with the First Omnibus Objection to the Revised Proposed Order is attached hereto as Exhibit 2.

Dated: December 6, 2021

Respectfully submitted,

/s/ Michael D. Warner
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Counsel for the Plan Administrator

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of December, 2021, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner
Michael D. Warner, Esq.